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September 9, 2010

Ms. Mary Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

Re: Proposed Final Rule – The Low-Income Definition

Dear Ms. Rupp and Members of the NCUA Board:

I am writing on behalf of the Board of Directors and management team of Visions Federal Credit Union which is headquartered in Endicott, New York and serves almost 125,000 members in Upstate New York and northern Pennsylvania including a number of underserved areas.

We have reviewed the change that clarifies that if a credit union wishes to use its own data to prove that it qualifies for a low income designation, it must do so in a manner consistent with the categories being used by your geo-coding software.

We agree that this clarification will ensure consistency in the designation of Low Income Credit Unions.

Thank you for the opportunity to comment on this proposed final rule.

Sincerely,

Frank E. Berrish  
President/ CEO

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cc: Fred Becker, President  
NAFCU

Dan Mica, President  
CUNA

